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*Attorneys for Interest Party
The Nevada Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LUIS SANDOVAL,

Plaintiff,

v.

STATE OF NEVADA EX REL. NEVADA
DEPARTMENT OF CORRECTIONS, *et al.*,

Defendants.

Case No. 2:25-cv-00500-MMD-NJK

**STIPULATION AND ORDER
SETTING DEADLINES FOR
ACCEPTANCE OF SERVICE AND
RESPONSES TO COMPLAINT
[ECF NO.1]**

Plaintiff Luis Sandoval, by and through counsel, Andre M. Lagomarsino, Esq. and Cristina P. Valentine, Esq, and Interested Party Nevada Department of Corrections (NDOC), by and through counsel, Aaron D. Ford, Nevada Attorney General, Randall Gilmer, Chief Deputy Attorney General, and Rudolf M. D'Silva, Deputy Attorney General, of the State of Nevada, Office of the Attorney General, and Interested Party Nevada Division of Forestry, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Nicole Ting, Deputy Attorney General, respectfully submit the following Stipulation and Order to setting deadlines for when the Office of the Attorney General (OAG) will accept service for the Defendants they will be representing in this lawsuit, and when Defendants will file a response to Plaintiff's Complaint once service has been accepted.

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I. BACKGROUND

Plaintiff Luis Sandoval (Sandoval) brought causes of action against several Defendants under Section 1983, and for violation of the United States Constitution, the Nevada Constitution, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act. ECF No. 1 at 2:1-5. Sandoval has brought suit against state government entities the Nevada Department of Corrections (NDOC) and the Nevada Division of Forestry (NDF). *Id.* at 4:2-11. Sandoval has also filed suit against the following individuals who are employed by either the NDOC or the NDF: Jermey Bean, Ronald Oliver, Kacey KC, Kimberly McCoy, Gillian Lambey, Mark Galven Martinez, Patricio Cordero, Edgar Desantiago, Kenneth Williams, Justin McRoberts, Elbeth Albana, Mirit Avram, Symour Omandac, and several Doe Defendants. *Id.* at 4:12-13:19.

II. LEGAL STANDAND

A stipulation is an agreement between the parties as to a fact of the case, and, as such, it is evidence introduced by both of the parties. *U.S. v. Hawkins*, 215 F.3d 858, 860 (8th Cir. 2000). Stipulations relating to proceedings before the court... must be in writing and signed by all parties who have appeared or their attorneys. LR 7-1(a). No stipulation relating to proceedings before the court ... are effective until approved by the court. LR 7-1(b).

III. DEADLINES

The Office of the Attorney General's (OAG) respective divisions, which represent the NDOC and NDF, agree to file a Notices of Acceptance of Service by **May 23, 2025**, notifying this Court and the Parties in this lawsuit which defendants the OAG will be accepting service on behalf of. Upon filing the Notice of Acceptance of Service, Defendants will file an answer or other response within **thirty (30)** days from the date service is accepted.

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1 Additionally, the Parties agree that Plaintiff will be allowed to immediately engage
2 in expedited discovery for the limited purpose of discovering the identities of defendants
3 identified by fictitious names in Plaintiff's Complaint.

4 DATED this 6th day of May, 2025.

DATED this 6th day of May, 2025.

5 AARON D. FORD
6 Attorney General

7 By: /s/ Andre M. Lagomarsino
8 ANDRE M. LAGOMARSINO, ESQ (#6711)
9 CRISTINA P. VALENTINE, ESQ (#16440)
Attorneys for Plaintiff

By: /s/ Rudolf M. D'Silva
RANDALL GILMER (#14001)
RUDOLF M. D'SILVA (#16227)
Deputy Attorney Generals
Attorneys for NDOC Defendants

10 DATED this 6th day of May, 2025.

11 By: /s/ Nicole Ting
12 NICOLE TING, ESQ (#12289)
13 Deputy Attorney General
Attorney for NDF Defendants

14 **IT IS SO ORDERED:**

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: May 7, 2025
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